

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SMITH KLINE & FRENCH LABORATORIES,
LTD, and SMITHKLINE BEECHAM CORP.,
d/b/a GLAXOSMITHKLINE,

Plaintiffs,

v.

TEVA PHARMACEUTICALS USA, INC.,

Defendant.

DEFENDANT TEVA PHARMACEUTICALS USA, INC.'S SECOND NOTICE OF
30(b)(6) DEPOSITION TO PLAINTIFFS GLAXOSMITHKLINE

PLEASE TAKE NOTICE THAT, beginning on June 9, 2006 at 9:30 A.M. at the offices of Kirkland & Ellis LLP, 655 Fifteenth Street, N.W., Washington, D.C. 20005, or at another mutually agreed upon place and time, Defendant Teva Pharmaceuticals USA, Inc. (“Teva”), will take the deposition of Plaintiffs Smith Kline & French Laboratories, Ltd. and SmithKline Beecham Corp., d/b/a GlaxoSmithKline (collectively “GSK”) as represented by the person(s) most knowledgeable with respect to the subject matter topics identified below and designated to testify on GSK’s behalf, pursuant to Fed. R. Civ. P. 30(b)(6).

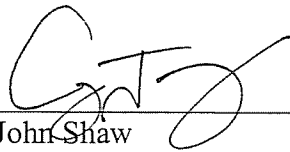
The oral examination will be taken before a notary public or other person authorized to administer oaths, and will be recorded by stenographic means and/or videotape. You are invited to attend and participate.

TOPICS

1. Facts and circumstances regarding the preparation, filing, and prosecution of the U.S. patent application that issued as U.S. Patent No. 4,314,944 (“the ‘944 patent”), and issuance of the ‘944 patent, including without limitation any prior art searches conducted, whether or not by Plaintiffs, before or during the prosecution of the ‘944 patent, and the identity of the people involved and their roles.
2. Facts and circumstances regarding the preparation, filing, and prosecution of the U.S. patent application that issued as U.S. Patent No. 4,452,808 (“the ‘808 patent”), and issuance of the ‘808 patent, including without limitation any prior art searches conducted, whether or not by Plaintiffs, before or during the prosecution of the ‘808 patent, and the identity of the people involved and their roles.
3. Facts and circumstances regarding the preparation, filing, and prosecution of the U.S. patent application that issued as U.S. Patent No. 4,824,860 (“the ‘860 patent”), and issuance of the ‘860 patent, including without limitation any prior art searches conducted, whether or not by Plaintiffs, before or during the prosecution of the ‘860 patent, and the identity of the people involved and their roles.

Date: May 19, 2006

Respectfully submitted,



John Shaw

Monte Squire

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Attorneys for Defendant Teva Pharmaceuticals U.S.A., Inc.

CERTIFICATE OF SERVICE

I, Monté T. Squire, Esquire, hereby certify that on May 22, 2006, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Patricia Smink Rogowski, Esquire
Connolly, Bove, Lodge & Hutz LLP
The Nemours Building
1007 North Orange Street
Wilmington, DE 19801

I further certify that on May 22, 2006, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and the following non-registered participant in the manner indicated:

BY E-MAIL

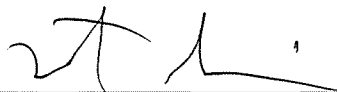
William F. Lee, Esquire
Wilmer, Cutler, Pickering, Hale and Dorr LLP
60 State Street
Boston, MA 02109

Additionally, I certify that on May 19, 2006, a copy of the foregoing document was served on the following non-registered participant in the manner indicated:

BY FACSIMILE AND FEDERAL EXPRESS

Michael E. Gordon, Esquire
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YOUNG CONAWAY STARGATT & TAYLOR, LLP

A handwritten signature in black ink, appearing to be 'JW Shaw', written over a horizontal line.

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